

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>MARGARET A. CARTER,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No. 2:07-cv-682</b>
	)	
<b>DIALYSIS CLINIC, INC.,</b>	)	
	)	
	)	
<b>Defendant.</b>	)	

**REPORT OF PARTIES' PLANNING MEETING**

Pursuant to FRCP Rule 26(f), a meeting was held on October 16, 2007 between Russell P. Parker, attorney for plaintiff, and Davidson French, attorney for defendant.

**1. Brief synopsis of the Case.**

Plaintiff claims she was retaliated against and terminated for taking FMLA leave. Defendant denies Plaintiff's allegations.

**2. Pre-discovery Disclosures.**

The parties will exchange the information required by Federal Rule 26(a)(1) by December 15, 2007.

**3. Discovery Plan.**

The parties jointly propose to the court the following discovery plan:

Without waiver of objections, discovery will be needed on the following subjects:

Plaintiff's claims in her Complaint, Plaintiff's Damages, if any, Defendant's defenses, Plaintiff's employment history, Plaintiff's history of promotion and compensation, and Defendant's retention, promotion, and compensation practices.

All discovery must be commenced in time to be completed by June 30, 2008.

Maximum of 25 interrogatories, including sub-parts, by each party to any other party. Responses due 30 days after service.

Maximum of 25 requests for admissions, including sub-parts, by each party to any other party. Responses due 30 days after service.

Maximum of 30 requests for production of documents, including sub-parts, by each party to any other party. Responses due 30 days after service.

Maximum of 10 depositions by each party. No deposition shall exceed seven hours unless agreed to by the parties or ordered by the Court.

Reports from retained experts, if any, under Rule 26(a)(2) are due:

From plaintiff - by January 15, 2008.

From defendant - by February 29, 2008.

Supplementation under Rule 26(e) due by May 15, 2008.

**4. Other Items.**

A scheduling conference is not requested prior to entry of a scheduling order.

Plaintiff has until December 31, 2007 to join additional parties and to amend the pleadings.

Defendant has until January 31, 2008 to join additional parties and to amend the pleadings.

All potentially dispositive motions must be filed and served by July 31, 2008.

Settlement cannot be evaluated until completion of initial discovery.

The parties will determine whether mediation should be entered upon completion of initial discovery.

Final lists of trial evidence under Rule 26(a)(3) are due 30 days before trial.

Parties have 10 days after service of final lists of trial evidence to state objections under Rule 26(a)(3).

The case will be ready for trial after September 2008 and is expected to take approximately three days.

s/ Russell P. Parker

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